

FARBER & CO.
ATTORNEYS, P.C.

*Please Direct All Correspondence to
333 Hegenberger Road, Suite 504
Oakland, CA 94621*

March 22, 2019

Via United States Mail

Maria Neish
Chubb Group Los Angeles
PO Box 30850
Los Angeles, CA 90030

Re: Jonathan Shockley v. Cardionet LLC
WCAB ADJ12031731
DOI CT 06/25/2018 - 02/15/2019
Claim No. 7173815490

Dear Madam:

Pursuant to Labor Code Sections 4061, applicant hereby objects to the 03/05/19 report of Primary Treating Physician, Dr. Lang. Should we be unable to agree upon the use of an AME, we will proceed forward by requesting a QME Panel pursuant to Labor Code Section 4062.2.

Very truly yours,
FARBER & COMPANY ATTORNEYS, P.C.



Iana Zadneprovskaja, Esq.
IZ/sl

The Hand Center of San Francisco, Inc

Kyle D Bickel, MD

Patrick O Lang, MD

Hand and Wrist Surgery

Upper Extremity Reconstruction

Microsurgery

Reconstructive Surgery

2019-03-01

Chubb/Wc
Po Box 42065
Phoenix, AZ 85080

RE: Jonathan Shockley
Employer: Biotelemetry
DOI: 02/16/2019
Claim #: 7173815490

HAND SURGERY CONSULTATION

Dear Ladies and Gentlemen:

I saw this patient today for evaluation of his bilateral hand, wrist, and forearm pain. Thank you for the referral.

HISTORY OF INJURY This patient is a 40-year-old right-hand-dominant electrocardiogram technician who reports a several month history of worsening bilateral hand, wrist, and forearm pain. He reports that his job requires very intense and prolonged use of a computer and mouse. The symptoms arose in the setting of at work. He does not recall any other specific history of trauma.

CURRENT SUBJECTIVE COMPLAINTS The patient reports vague and diffuse bilateral hand, wrist, and forearm pain.

PREVIOUS WORK/INJURY HISTORY The patient reports a prior Achilles tendon injury.

PAST MEDICAL HISTORY Patient denies any significant past medical history. Surgical history includes removal of a bone spur from the foot and two prior Achilles tendon operations. Medications include aspirin and Advil as needed. He has no known drug allergies.

SOCIAL HISTORY The patient works as an electrocardiogram technician but does extensive data analysis on a computer. He previously worked as a ballet dancer. He does not smoke. He does not drink alcohol.

Patient Name Shockley, Jonathan

Date of Visit 2019-03-01

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PHYSICAL EXAM Vital signs SPO2 100%, blood pressure 116/59, heart rate 61, respiratory 12, temperature 96.7.

Examination of the bilateral upper extremities reveals no deformity. Tinel's sign in the ulnar nerve at the elbow is negative bilaterally. Forearm compartments are soft and nontender to palpation bilaterally. Finkelstein's test is negative bilaterally. Watson's test is negative bilaterally. Wrist and digital range of motion are normal bilaterally. There is no A1 pulley tenderness or triggering throughout either hand. Sensation is grossly intact distally bilaterally.

IMPRESSION 40-year-old man with bilateral upper extremity repetitive strain injury.

TREATMENT RECOMMENDATIONS I had a lengthy discussion with the patient regarding his diagnosis of repetitive strain injury. The symptoms are undoubtedly related to his work on a computer. I recommended he begin working with an occupational hand therapist on a repetitive strain protocol. I also talked with him about optimizing his computer workstation ergonomics and using dictation software as much as possible. All questions are answered. I can see him back in 6-8 weeks to reassess his symptoms.

Thank you again for the referral. Please let me know if I can be of any further help.

Sincerely,

Patrick O Lang, M.D.

Cal Lic #A106890

POL/ja

ELECTRONICALLY SIGNED BY PATRICK O LANG, MD

Executed at San Francisco, CA. Date: 3/5/2019 6:42:42 AM

I declare under penalty of perjury that this report is true and correct to the best of my knowledge and that I have not violated California Labor Code 139.3